



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

MPR/RCH/EMR
F. #2019R00927

*271 Cadman Plaza East
Brooklyn, New York 11201*

August 19, 2020

By FedEx

Cesar DeCastro, Esq.
7 World Trade Center, 34th Floor
New York, NY 10007

Re: United States v. Genaro Garcia Luna
Criminal Docket No. 19-576 (BMC)

Dear Counsel:

Enclosed please find the government's supplemental discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. Please note the enclosed discovery contains Protected Material and should be handled consistently with the Protective Order. The government also requests reciprocal discovery from the defendant.

I. The Government's Discovery

Enclosed please find:

- Intercepted communications, Bates-numbered 00000154349-00000155189; 00000155190-00000155190; 00000155191-00000155236; 00000155237-00000155237; 00000155238-00000155238; 00000155238-00000155239; 00000155238-00000155240; 00000155241-000000155241; 00000155242-00000157638; 00000157639-00000158340; 00000158341-00000158656; 00000158657-00000158657; 00000158658-00000158658; 00000158659-00000159507; 00000159508-00000169244; 00000169245-00000169246; and 00000172452-00000172452;
- Financial Records, Bates-numbered 00000169247-00000172412 and 00000172413-00000172451; and
- In response to the Court's August 9, 2020 Order, grand jury records from the Master Jury Wheel provided by the Clerk of the Court, Bates-numbered 00000172453, as well as a cover letter from the Clerk of the Court, Bates-numbered 00000172454.

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact me.

Very truly yours,

RICHARD P. DONOGHUE
United States Attorney

By: /s/
Michael P. Robotti
Ryan C. Harris
Erin M. Reid
Assistant U.S. Attorneys
(718) 254-7000

Enclosures

cc: Clerk of Court (BMC) (via ECF)